

US BANK/FCC SEP 06 2012

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READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE
FORM 159

Approved by OMB
30604589
Page No. 1 of 2

(1) LOCKBOX # 979091		SPECIAL USE ONLY	
		FCC USE ONLY	
SECTION A - PAYER INFORMATION			
(2) PAYER NAME (if paying by credit card enter name exactly as it appears on the card) Min S. Kang		(3) TOTAL AMOUNT PAID (U.S. Dollars and cents) \$1,050.00	
(4) STREET ADDRESS LINE NO. 1 8181 Short Grass Cove			
(5) STREET ADDRESS LINE NO. 2			
(6) CITY Arlington		(7) STATE TN	(8) ZIP CODE 38002
(9) DAYTIME TELEPHONE NUMBER (include area code) (901) 581-8222		(10) COUNTRY CODE (if not in U.S.A.)	
FCC REGISTRATION NUMBER (FRN) REQUIRED			
(11) PAYER (FRN) 0017116849		(12) FCC USE ONLY	
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C) COMPLETE SECTION BELOW FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET			
(13) APPLICANT NAME RightLink USA, Inc.			
(14) STREET ADDRESS LINE NO. 1 17100 SW 94th Ave.			
(15) STREET ADDRESS LINE NO. 2			
(16) CITY Miami		(17) STATE FL	(18) ZIP CODE 33157
(19) DAYTIME TELEPHONE NUMBER (include area code) (786) 325-9249		(20) COUNTRY CODE (if not in U.S.A.)	
FCC REGISTRATION NUMBER (FRN) REQUIRED			
(21) APPLICANT (FRN) 0017116849		(22) FCC USE ONLY	
COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET			
(23A) CALL SIGN/OTHER ID	(24A) PAYMENT TYPE CODE CDT	(25A) QUANTITY 1	
(26A) FEE DUE FOR (PTC) \$1,050.00	(27A) TOTAL FEE \$1,050.00	FCC USE ONLY	
(28A) FCC CODE 1		(29A) FCC CODE 2	
(23B) CALL SIGN/OTHER ID	(24B) PAYMENT TYPE CODE	(25B) QUANTITY	
(26B) FEE DUE FOR (PTC)	(27B) TOTAL FEE	FCC USE ONLY	
(28B) FCC CODE 1		(29B) FCC CODE 2	

CERTIFY
I, Min
the best of
SIGNATURE

PAID BY CREDIT CARD

ACCOUNT
I hereby
SIGNATURE

PAID BY CREDIT CARD

Lance J.M. Steinhart, P.C.

Attorney At Law
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005

Also Admitted in New York
and Maryland

Telephone: (770) 232-9200
Facsimile: (770) 232-9208
Email: lsteinhart@telecomcounsel.com

September 5, 2012

VIA OVERNIGHT DELIVERY

c/o US Bank, Government Lockbox
Federal Communications Commission
1005 Convention Plaza
St. Louis, Missouri 63101-1229
(202) 418-0220

Re: Transfer of Control of Section 214 Authority
RightLink USA, Inc.

Dear Sir/Madam:

Enclosed please find for filing an FCC Form 159 including credit card information for payment of the \$1,050.00 filing fee for RightLink USA, Inc.'s Application for approval of Transfer of Control.

Please date-stamp the extra copy of this FCC Form 159 and return it in the enclosed self-addressed stamped envelope.

If you have any questions regarding the foregoing, please do not hesitate to call me. Thank you.

Respectfully submitted,


Lance J.M. Steinhart
Attorney for RightLink USA, Inc.

Enclosures

Lance J.M. Steinhart, P.C.

Attorney At Law
1725 Windward Concourse
Suite 150
Alpharetta, Georgia 30005

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Telephone: (770) 232-9200
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Email: lsteinhart@telecomcounsel.com

September 5, 2012

VIA OVERNIGHT DELIVERY

Federal Communications Commission
Wireline Competition Bureau
P.O. Box 979091
St. Louis, Missouri 63197-9000

Re: Application for Approval of a Transfer of Control
RightLink USA, Inc.

To Whom It May Concern:

Enclosed please find for filing an original and five (5) copies of Application for approval of a Transfer of Control for RightLink USA, Inc. pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214.

Also enclosed please find a copy of the submitted FCC Form 159 and cover letter submitted to US Bank, Government Lockbox for payment of the \$1,050.00 filing fee by credit card on September 5, 2012.

If you have any questions regarding the foregoing, please do not hesitate to call me. Thank you.

Respectfully submitted,


Lance J.M. Steinhart
Attorney for RightLink USA, Inc.

Enclosures

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
RightLink USA, Inc.)	
)	WC Docket No. _____
)	
Application Pursuant to Section 214 of the)	
Communications Act of 1934, as amended,)	
and Section 63.04 of the Commission's Rules for)	
Approval of the Transfer of Control of a)	
Domestic Interstate Common Carrier)	

APPLICATION FOR APPROVAL OF A TRANSFER OF CONTROL
STREAMLINED PROCESSING REQUESTED

Michael Ukwendu ("Transferor") and Min-Su Kang ("Transferee") (collectively "Applicants"), by their undersigned attorney and pursuant to Section 214 of the Communications Act of 1934 (the "Act"), as amended, 47 U.S.C. § 214, and Section 63.04 of the Federal Communications Commission's ("Commission") Rules, 47 C.F.R. § 63.04, hereby respectfully seek Commission approval to transfer control of RightLink USA, Inc. ("RightLink USA") (FRN: 0017116849) from Michael Ukwendu to Min-Su Kang (the "Transaction"). Streamlined processing of this Application is requested pursuant to Section 63.03 of the Commission's Rules, 47 C.F.R. § 63.03. Applicants provide below the information required by Section 63.04 of the Commission's Rules, 47 C.F.R. § 63.04.

I. SECTION 63.04 INFORMATION

In support of this Application, Applicants submit the following information in response to the requirements of Section 63.04(a) of the Commission's Rules. Information is provided in the order in which those requirements appear.

(1) Name, Address and Telephone Number of Transferor and Transferee

Transferor: Michael Ukwendu
RightLink USA, Inc.
17100 SW 94th Ave.
Miami, FL 33157
Tel: (786) 325-9249
Email: info@RightLinkusa.com

Transferee: Min-Su Kang
8181 Short Grass Cove
Arlington, TN 38002
Tel: (901) 581-8222
Email: mtkang08@gmail.com

(2) State of Organization

RightLink USA, Inc. is a Florida corporation.

(3) Point of Contact Information

Correspondence concerning this Application for the Transferor and the Transferee should be sent to:

Lance J.M. Steinhart
Lance J Steinhart, P.C.
1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
Tel: (770) 232-9200
Fax: (770) 232-9208
E-Mail: lsteinhart@telecomcounsel.com

(4) Information concerning the ten percent (10%) or greater owners

The Transferor and Transferee are "direct" shareholders. There are, and will be no other direct or indirect shareholders in RightLink USA, Inc.

The pre-Transaction ownership of **RightLink USA, Inc.** is as follows:

Name: Michael Ukwendu
Address: 17100 SW 94th Ave.
Miami, FL 33157
Citizenship: United States

Principal Business: Telecommunications
Interest: 100%

The post-Transaction ownership of **RightLink USA, Inc.** will be as follows:

Name: Min-Su Kang
Address: 8181 Short Grass Cove
Arlington, TN 38002
Citizenship: United States
Interest: 100%

(5) Anti-Drug Abuse Act of 1988 Certification

By the attached certification, Applicants certify pursuant to 47 C.F.R. §§ 1.2001-1.2008 of the Commission's Rules that no party to the Application is subject to a denial of Federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988.

(6) Description of the Transaction

The Parties. RightLink USA, Inc. (FRN: 0017116849) is a corporation organized under the laws of the State of Florida. Its principal offices are located at 17100 SW 94th Ave., Miami, FL 33157. RightLink USA holds blanket domestic Section 214 authority to provide telecommunications services. RightLink USA is currently authorized, pursuant to certification, tariff, registration, notification or on an unregulated basis, to provide competitive local exchange service in Florida to residential and business customers.

Transferor, a United States citizen, is the current 100% individual owner of RightLink USA, Inc., and Transferee, a United States citizen, will be the 100% individual owner of the equity interests of RightLink USA, Inc. following the consummation of the proposed Transaction.

The Transaction.

Pursuant to the terms of a Stock Purchase Agreement, Min-Su Kang will purchase 100% of the equity interests of RightLink USA. For the Commission's convenience, pre- and post-closing organization illustrative charts are provided as Exhibit A. The transfer of control of RightLink USA will involve no disruption, impairment, or other changes in the entity providing service to customers, the facilities used to provide such services, or the rates, terms and conditions of such service. All existing tariffs will remain in place. In addition, the contact points for customers and Commission inquiries will remain the same after the transfer of control. All existing customer service numbers/operations, contracts and procedures of RightLink USA will remain in place after the transaction, including procedures relating to billing and repair complaints. Although the transaction will result in a change in the control of RightLink USA, no assignment of authorizations, assets, or customers will occur as a consequence of the transaction. RightLink USA will continue to provide service to RightLink USA existing customers pursuant to RightLink USA authorizations under the same rates, terms and conditions. Accordingly, this transaction will be transparent to the customers of RightLink USA.

(7) Description of Geographic Service Area and Services in Each Area

RightLink USA is currently authorized, pursuant to certification, tariff, registration, notification or on an unregulated basis, to provide competitive local exchange service in Florida to residential and business customers.

(8) Qualification for Streamlining

Applicant requests streamlined processing of this Application pursuant to Section 63.03 of the Commission's rules, 47 C.F.R. § 63.03. This Application is eligible for streamlined processing pursuant to Section 63.03(b)(2) of the Commission's rules because: (1) the proposed

Transaction will result in Transferee having a market share in the interstate interexchange market of less than ten percent (10%); (2) Transferee will provide competitive telephone exchange services exclusively in geographic areas served by a dominant local exchange carrier that is not a party to the Transaction; and (3) neither Applicant nor any of their affiliates are regulated as dominant with respect to any service.

(9) Other Pending Commission Applications

None

(10) Special Consideration

None.

(11) Waiver Requests (If Any)

None.

(12) Public Interest Statement

Approval of the Transaction is in the public interest because the Transferee will enhance economic efficiency by enabling RightLink USA to expand its own business and achieve economies of scale. These benefits will strengthen RightLink USA's ability to expand its offerings and services to a broader customer base. As a competitive provider of telephone services, RightLink USA will provide customers the positive benefit of access to existing and new product offerings.

The proposed Transaction will have no adverse effect on the current customers. The proposed transfer of control involves no disruption, impairment, or other changes in the entity providing service to customers, the facilities used to provide such services, or the rates, terms and conditions of such service. All existing tariffs will remain in place. In addition, the contact points for customers and Commission inquiries will remain the same after the transfer of control.

All existing customer service numbers/operations, contracts and procedures of RightLink USA will remain in place after the proposed Transaction, including procedures relating to billing and repair complaints. Further, the Transaction will not result in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment.

Further, as stated above, the Transaction will be conducted in a manner that will not affect the ongoing service of existing customers. Following consummation of the Transaction, RightLink USA will continue to provide high-quality communications services to its customers without interruption and without immediate change in rates, terms or conditions. As evidenced by this Application's eligibility for streamlined processing, transactions such as these do not raise anticompetitive concerns for the Commission.¹ Neither Applicant is (or is affiliated with) an ILEC.

¹ *Implementation of Further Streamlining Measures for Domestic Section 214 Authorizations*, Report and Order, 17 FCC Rcd. 5517, ¶ 30 (2002).

II. CONCLUSION

For the reasons stated above, Applicants respectfully submit that the public interest, convenience, and necessity would be furthered by grant of this Application for consent to the transfer of control of RightLink USA, Inc., to Transferee, Min-Su Kang.

Respectfully submitted,

Michael Ukwendu (TRANSFEROR)



Michael Ukwendu, President
RightLink USA, Inc.
17100 SW 94th Ave.
Miami, Florida 33157

Min-Su Kang (TRANSFeree)



Min-Su Kang
8181 Short Grass Cove
Arlington, TN 38002

Attorney for both Parties:

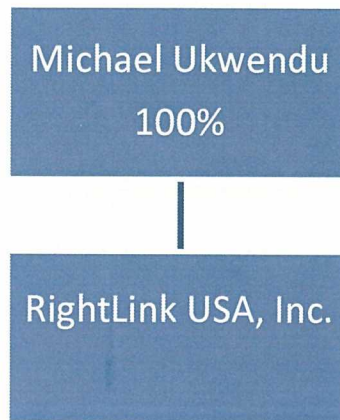
Lance J.M. Steinhart
Lance J.M. Steinhart, P.C.
1725 Windward Concourse, Suite 150
Alpharetta, Georgia 30005
(770) 232-9200 (Telephone)
(770) 232-9208 (Facsimile)
lsteinhart@telecomcounsel.com (E-Mail)

Dated: August 31, 2012

EXHIBIT A

PRE- AND POST-CLOSING ORGANIZATIONAL CHARTS

Pre Closing



Post Closing



CERTIFICATIONS

CERTIFICATION

I, Michael Ukwendu, President of RightLink USA, Inc. ("RightLink") and the Transferor in the foregoing application, hereby certify under penalty of perjury that I am authorized to make this Certification on behalf of RightLink. I further certify that the information in the foregoing application as it pertains to RightLink and the Transferor is true and accurate to the best of my knowledge, and that the Transferor is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853(a), as amended.



Michael Ukwendu, President

Date: 8/31/12

CERTIFICATION

I, Min-Su Kang, the Transferee in the foregoing application, hereby certify under penalty of perjury that the information in the foregoing application as it pertains to the Transferee is true and accurate to the best of my knowledge, and that the Transferee is not subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853(a), as amended.


Min-Su Kang

Date: 8-31-12